

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Otis Mills, Jr.	:	Case No.18-21445JAD
	:	Chapter 13
Debtor(s)	:	
Ronda J. Winnecour, Trustee	:	
	:	Related to Document #
Movant(s)	:	
	:	Hearing Date
vs.	:	
Otis Mills, Jr.	:	
Respondent(s)	:	

CHAPTER 13 TRUSTEE'S MOTION TO CONVERT CHAPTER 13 CASE TO  
CHAPTER 7 CASE

Ronda J. Winnecour, Chapter 13 Trustee, by her undersigned counsel,  
respectfully represents the following:

1. This case was filed on April 13, 2018.
2. Ronda J. Winnecour is the Chapter 13 Standing Trustee in this case.
3. Thirteen (13) months have elapsed in this case.
4. The Meeting of Creditors was held on July 30, 2018 but continued to October 18, 2018.
5. A contested hearing was held on November 28, 2018, and an Order was entered ordering the Debtor to remit a payment to the Chapter 13 Trustee in the amount of \$11,000.00 no later than December 12, 2018. It further ordered the Debtor to submit all of his outstanding state and federal tax returns to the Trustee.
6. The Order provided that "[s]hould the Debtor fail to timely comply with the terms of this Order, the Court shall consider whether further relief is warranted. Such further relief considered is dismissal of this bankruptcy case with prejudice or conversion of the case to a chapter 7 liquidation."

7. The Trustee has not received the \$11,000.00 payment or the Debtor's tax returns.

8. The Debtor has not made single plan payment and is in arrears in the amount of \$32,500.00.

9. Therefore, the Trustee requests that the case be converted to a chapter 7 liquidation case.

WHEREFORE, the Trustee respectfully requests that the above captioned case be converted to a chapter 7 bankruptcy case.

RONDA J. WINNECOUR,  
CHAPTER 13 TRUSTEE

Date: 05/23/19

by /s/ Jana S. Pail  
Jana S. Pail - PA I.D. #88910  
Attorney for Trustee  
US Steel Tower – Suite 3250  
600 Grant St.  
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(412) 471-5566  
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CERTIFICATE OF SERVICE

I hereby certify that on the 23<sup>rd</sup> of May 2019, I served one true and correct copy of the foregoing document, along with Notice of Hearing with Response Deadline on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire  
Assistant U.S. Trustee  
Suite 970, Liberty Center  
1001 Liberty Avenue  
Pittsburgh PA. 15222

Otis Mills, Jr.  
2361 Haymaker Road  
Monroeville PA 15146

Michael S. Geisler, Esquire  
201 Penn Center Blvd Suite 524  
Pittsburgh PA 15235

/s/Dianne DeFoor  
Office of Chapter 13 Trustee  
US Steel Tower – Suite 3250  
600 Grant Street  
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(412) 471-5566  
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